

**FILED UNDER SEAL PURSUANT TO PROTECTIVE ORDER**

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

CELLCO PARTNERSHIP d/b/a VERIZON  
WIRELESS and VERIZON CORPORATE  
SERVICES GROUP, INC.,

*Defendants.*

Civil Action No. 2:23-cv-00352-JRG-RSP

**DECLARATION OF ELI BALSAM IN SUPPORT OF DEFENDANTS' UNOPPOSED  
MOTION FOR LEAVE TO SUPPLEMENT EXPERT REPORT OF MS. LAURA  
STAMM TO RESPOND TO HEADWATER'S RECENTLY ALLOWED  
SUPPLEMENTAL EXPERT REPORTS**

I, Eli Balsam, hereby declare as follows:

1. I am a resident of the United States and over the age of 21. The facts set forth herein are true and of my personal knowledge. If called upon to testify, I could and would verify competently thereto.

2. I am an associate at the law firm of Gibson, Dunn & Crutcher LLP and represent the Defendants in this matter. I submit this declaration in support of Defendants' Unopposed Motion for Leave to Supplement Expert Report of Ms. Laura Stamm to Respond to Headwater's Recently Allowed Supplemental Expert Reports.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the Supplemental Rebuttal Expert Report of Laura B. Stamm, dated March 18, 2025.

Executed on June 26, 2025.

/s/ Eli Balsam  
Eli Balsam